United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	AK R 0 6 A C 6 0	1 6 1 0 0 4	~	R	2

Remarks

21 ____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 10 69	70	71	72	73 74	75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
North Star Terminal & Stevedore Co., LLC 790 Ocean Dock Road Anchorage, AK 99501	9:20AM 10/04/16	04/01/2015
	Exit Time/Date 11:45AM 10/04/16`	Permit Expiration Date 03/31/2020

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*
Steve Black, Anchorage Operations Manager (907) 263-0121 steveb@northstarak.com	NAICS 488320 - Marine Cargo Handling ADEC MSGP Inspection Lat: 61.228052 Long: -149.895144

Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted
Steve Black, Anchorage Operations Manager (907) 263-0121 North Star Terminal & Stevedore Co., LLC 790 Ocean Dock Road Anchorage, AK 99501	☑ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

✓ Permit	✓ Self-Monitoring Program	☐ Pretreatment	☐ MS4
✓ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
✓ Facility Site Review	☐ Laboratory	✓ Storm Water	
✓ Effluent/Receiving Waters	✓ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes — SEV Description

• • • • • • • • • • _____
• • • • • • • • • • _____
• • • • • • • • • • _____
• • • • • • • • • • _____

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Jon Klemesrud	EPA R10/OCE/MIRE 206-553-5068	10/07/2016
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
Kimberly A Ogle	EPA/OCE/MIRE 3-0955	12/29/16

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

ICIS.
10-12-16 JBrown

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

- A Performance Audit
- B Compliance Biomonitoring
- C Compliance Evaluation (non-sampling)
- D Diagnostic
- F Pretreatment (Follow-up)
- G Pretreatment (Audit)
- I Industrial User (IU) Inspection
- J Complaints
- M Multimedia
- N Spill
- O Compliance Evaluation (Oversight)
- P Pretreatment Compliance Inspection
- R Reconnaissance
- S Compliance Sampling
- U IU Inspection with Pretreatment Audit
- X Toxics Inspection
- Z Sludge - Biosolids
- # Combined Sewer Overflow-Sampling
- $ Combined Sewer Overflow-Non-Sampling
- + Sanitary Sewer Overflow-Sampling
- & Sanitary Sewer Overflow-Non-Sampling
- \ CAFO-Sampling
- = CAFO-Non-Sampling
- 2 IU Sampling Inspection
- 3 IU Non-Sampling Inspection
- 4 IU Toxics Inspection
- 5 IU Sampling Inspection with Pretreatment
- 6 IU Non-Sampling Inspection with Pretreatment
- 7 IU Toxics with Pretreatment
- ! Pretreatment Compliance (Oversight)
- @ Follow-up (enforcement)
- { Storm Water-Construction-Sampling
- } Storm Water-Construction-Non-Sampling
- : Storm Water-Non-Construction-Sampling
- ~ Storm Water-Non-Construction-Non-Sampling
- < Storm Water-MS4-Sampling
- - Storm Water-MS4-Non-Sampling
- > Storm Water-MS4-Audit

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

- A — State (Contractor)
- B — EPA (Contractor)
- E — Corps of Engineers
- J — Joint EPA/State Inspectors—EPA Lead
- L — Local Health Department (State)
- N — NEIC Inspectors
- O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
- P — Other Inspectors, State (Specify in Remarks columns)
- R — EPA Regional Inspector
- S — State Inspector
- T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

Alaska Pollutant Discharge Elimination System
(APDES) Inspection Report

North Star Terminal & Stevedore Co., LLC
APDES # AKR06AC60

Prepared by:

Jon Klemesrud
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Inspection and Enforcement Management Unit

Table of Contents

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Steve Black, Brad Robertson or from observations made during the inspection.]

I. Facility Information

Facility Name:	North Star Terminal & Stevedore Co., LLC (North Star)
Facility Contacts:	Steve Black – Anchorage Operations Manager (907) 263-0121 steveb@northstarak.com Brad Robertson – State Operations Manager (907) 263-0169 bradr@northstarak.com
Facility Location:	790 Ocean Dock Road Anchorage, AK 99501
GPS:	N 61.228052 W -149.895144
Mailing Address:	North Star Terminal & Stevedore Co., LLC 790 Ocean Dock Road Anchorage, AK 99501
APDES Tracking Number:	AKR06AC60

II. Inspection Information

Inspection Date:	October 4, 2016
Inspectors:	Jon Klemesrud, Inspector EPA Region 10, OCE / MIRE (206) 553-5068 Katrina Chambon, Environmental Program Specialist Alaska Department of Environmental Conservation Division of Water/Compliance Program (907) 269-7550
Arrival Time: Departure Time:	09:20 AM 11:45 AM
Weather Condition:	Cloudy
Receiving waters:	Knik Arm of Cook Inlet

Purpose: Document the facility's compliance with the Alaska Multi-Sector General Permit for Storm Water Discharges Associated with Industrial Activity (MSGP) and Section 402 of the Clean Water Act (CWA).

III. Inspection Chronology

This was an unannounced inspection. Just prior to arriving at the facility on October 4, 2016, I called Steve Black, Anchorage Operations Manager for North Star. I introduced myself and he and I agreed on an inspection that morning. We discussed the inspection as well as logistics to the site.

I arrived at the North Star facility with Alaska Department of Environmental Conservation (ADEC) representative Katrina Chambon. We met with Mr. Black as well as State Operations Manager Brad Robertson. At this time, I identified myself as an EPA inspector, presented my inspector credentials and provided both Mr. Black and Mr. Robertson with my business card. I informed Mr. Black and Mr. Robertson that the purpose of the visit was to conduct a compliance inspection under the facility's 2015 MSGP and the CWA. Mrs. Chambon also introduced herself and stated that her attendance on the EPA inspection was for shadowing purposes only.

The EPA inspection consisted of an opening conference to conduct initial introductions and to discuss the purpose and expectations of the inspection. The inspection included a records review and a facility walk-through.

The walk-through was followed by a closing conference where I discussed compliance-related concerns with Mr. Black and Mr. Robertson.

IV. Background

Coverage under the Alaska 2015 MSGP began August 13, 2015. (Seven days after ADEC acknowledgment of the completed Notice of Intent). The facility was previously covered under the 2008 MSGP AKR05DC50. According to the facility's Stormwater Pollution Prevention Plan (SWPPP) the estimated area of industrial activity exposed to stormwater is approximately 22 acres.

Stormwater discharges for the site are covered under MSGP Sector Q for "Water Transportation" industrial activities. North Star is a marine shipping and distribution facility located just outside the boundary of the Port of Anchorage. North Star provides marine terminal services to barges and marine support vessels including offloading and loading goods/materials for distribution and transport. The primary operations include stevedoring, equipment maintence and mobilization, and land and equipment leasing.

According to Mr. Black the facility has been at this location since 1957, and employs 20-50 people, some of which through the daily labor union. According to their SWPPP, North Star leases the Anchorage property from the Alaska Railroad Corporation (ARRC).

The Anchorage location is the main office for North Star which also has satellite offices in Valdez, Seward, Homer, and Dutch Harbor.

According to Mr. Black, large portions of the site are subleased to other companies, these subleased areas are included in the MSGP coverage by North Star. Activities occurring at these subleased areas at the time of inspection included scrap metal storage, vehicle and equipment storage, and finished/wrapped lumber storage. These activities are identified in the facility's SWPPP.

V. Facility Review

The North Star operating area consists of a dock, cargo storage areas, a number of vehicle and equipment storage areas, a paint tent, a maintence shop, and an office building.

The majority of the property is exposed to stormwater, industrial activities exposed to stormwater for the North Star operation include material handling and storage, and occasional pressure washing which occurs outside of the maintence shop.

Material handling and storage occurs at the dock and throughout most of the facility. The facility operates and maintains cranes, forklifts, loaders, and dozers. Some materials are exposed; others are stored under cover or in accessible shipping crates. According to the SWPPP the associated pollutants for this listed activity includes: fuel, oil, grease, heavy metals, spent solvents and debris.

Pressure washing occurs outside the maintence shop on occasion. Potential pollutants from the pressure washing area are listed in the facility's SWPPP an include: paint solids, oil, grease, heavy metals, suspended solids, and debris. Surface preparation, paint removal, sand and painting occurs within the paint tent which is fully enclosed.

The southwest corner of the property was historically subleased by North Star to Schnitzer Steel and used for stockpiling scrap metal prior to loading/transport via barge. According to the Mr. Black, Schnitzer Steel had subleased this area for 10+ years up until mid-September 2016. According to Mr. Black, Schnitzer Steel sold the business and assets to Alaska Scrap and Recycling. At the time of inspection, the majority of the scrap metal had been removed from the site.

The north end of the property is subleased by North Star to Bernard Builders Supply (SBS) and is used for the storage of finished/wrapped lumber.

The entire site including the subleased areas consists of compacted gravel. The site has a total of nine catch basins and two outfalls. The north end of the site has a series of four catch basins that eventually discharge to the north outfall. The south end of the site has a series of five catch basins that eventually discharge to the south outfall. Both the north and south outfalls discharge to the Knik Arm of Cook Inlet. See Attachment A, Facility Map, and Attachment B, Facility Aerial Image.

According to Mr. Black, stormwater best management practices incorporated at North Star include:

- Health, Safety, Environmental (HSE) walk-through inspections. According to Mr. Black, he frequently conducts routine walk-through inspections documenting issues and taking pictures of problem areas. Following the inspection, Mr. Black provided me with 3 examples of his HSE walk-through inspection notes via email. According to Mr. Black the walk-throughs occurred on 10/20/15, 2/11/16, and 4/19/16. The inspection notes provided to me from Mr. Black are attached to this inspection report as Attachment C.

- Annual stormwater basin clean outs. According to Mr. Black, North Star contracts a yearly catch basin clean out. Work is performed by Alaska Stormwater Maintence, Inc. Following my inspection, Mr. Black provided an invoice for the 2015 annual cleaning. This invoice is attached to this inspection as Attachment D.

During the facility tour we examined all areas occupied by North Star including the material storage areas, all stormwater catch basins, sampling locations and outfalls. See Attachment E, Photo Log for areas visited at the time of inspection.

VI. Records Review

At the time of the inspection, the file review included the following records:

- **NPDES Permit** – At the time of the inspection Mr. Black provided me with the current copy of the MSGP.

- **Stormwater Pollution Prevention Plan (SWPPP)** – At the time of the inspection I requested a copy of the latest SWPPP. The SWPPP was created by contractor Shannon & Wilson, Inc. for North Star. It was certified by Mr. Black on 7/30/2015. No updates had been made since the final draft (July 2015). The SWPPP (w/o attachments) is attached to this report as Attachment E.

- **Sampling and Analytical Records** - At the time of the inspection I asked Mr. Black for all of the documentation associated with stormwater sampling at the facility. Mr. Black provided me with a completed lab report from their contract lab, Avocet Environmental, as well as the associated chain of custody form. The sampling event occurred on the July 30, 2015. The documentation for the sampling event is attached to this report as Attachment F.

VII. Areas of Concern

Observations during the inspection included the identification of 12 areas of concern. These areas of concern are described as follows:

A. Well Water Addition to Stormwater Discharge

Section 1.2.3 of the permit lists allowable non-storm water discharges to include "uncontaminated ground water or spring water."

At the time of inspection, it was observed that the facility has an on-site Class C drinking water well that has a constant discharge to a stormwater catch basin located just south of the main office. The water from the well comingles with stormwater and eventually discharges to the South Outfall. See Attachment E, Photo Log, Photo #21. The Class C well water discharge is described on page 6 of the facility's SWPPP which is attached to this report as Attachment E.

Section 7.1.8 states that the permittee is "required to monitor allowable non-storm water discharges when they are commingled with stormwater discharges associated with industrial activity."

The well water is not monitored separately from the stormwater discharge. The concern is that due to the well water connection not sampled separately, stormwater discharge monitoring results may not be truly representative.

B. Outdoor Pressure Washing Area

Section 4.2.1 of the permit states that permittees should ensure that wash water drains to sanitary sewer, sump or other proper collection system (i.e., not the stormwater drainage system). "The discharge of vehicle and equipment wash water, including tank cleaning operation, is not authorized by this permit."

According to the SWPPP, equipment washing is conducted in the summer months outside of the maintence shop in an area where wash water infiltrates the permeable gravel pad and does not discharge off site.

At the time of inspection, I observed a buildup of sediment/material at the wash down area. A stormwater catch basin is located approximately 25 feet away. The catch basin had an adsorbent boom around which was in need of maintence. No controls were in place to prevent water from the pressure washing area from discharging into the stormwater collection system. See Attachment E, Photo Log, Photo #24 & #25.

C. South Subleased Area

Section 4.2.1 of the permit states that the "permittee must evaluate the facility regarding exposure or manufacturing, processing, and material storage areas (including loading, unloading, storage, disposal, cleaning, maintence and fueling operations) to rain, snow, snowmelt and runoff and minimize exposure…."

The south subleased area was used historically by Schnitzer Steel for the stockpiling of scrap metal prior to loading/shipping via barge.

Results from the July 2015 sampling event from a nearby catch basin (south outfall) showed high levels of metals. See Attachment G, 7/20/2015 Sampling Event Documentation.

The concern is the lack of BMPs and/or BMP maintence in relation to the activity that occurs at this location. See Attachment E, Photo Log, Photo #11, #17 & #18.

D. Stormwater BMP Management

Section 4.2.6 of the permit states that a "permittee must divert, infiltrate, reuse, contain or otherwise reduce stormwater runoff, to minimize pollutants in their discharge.

Catch basins BMPs observed at the time of inspection included adsorbent booms, the majority of the booms required maintence and many catch basins did not have any BMPs in place. See Attachment E, Photo Log, Photo #02, #05, #13, #14, #18, #19 #21.

E. Stormwater Training

Section 4.2.9 and Section 11.Q.3.4 of the permit describes the annual training requirements. Training must cover both the specific control measures used to achieve effluent limits, monitoring, inspection, planning, reporting, and documentation requirements. Training shall be conducted at least annually and documented in the SWPPP.

According to Mr. Black the facility does not have a specific stormwater training program as described in the SWPPP. The SWPPP (w/o attachments) is attached to this report as Attachment E.

F. SWPPP and Subleased Area Requirements

Section 5.2.4.2 of the permit describes SWPPP requirements related to the summary of "Pollutants" within the SWPPP.

According to Mr. Black the subleased areas are included in the MSGP coverage, however the SWPPP doesn't describe potential pollutants from these subleased areas. The SWPPP (w/o attachments) is attached to this report as Attachment E.

The industrial activity occurring at these subleased areas may fall under separate sector specific portions of the permit and may subject to additional permit requirements. I encouraged Mr. Black to review this section in the permit.

G. Routine Facility Inspection Documentation

Section 6.1.2. of the permit states that the "permittee must document their findings of each routine facility inspection performed and maintained this documentation onsite with the SWPPP."

At a minimum each routine inspection must include such items as: date, and time, name and signature of the inspector, weather information, observations of control measures. Inspections must be conducted at least quarterly.

According to Mr. Black, he conducts periodic walkthroughs related to health and safety, good housekeeping and some stormwater elements. Following the inspection, Mr. Black provided me via email documentation of 3 periodic walkthroughs. See Attachment C, 10/20/15, 2/11/16, 4/19/16 Health, Safety, Environmental (HSE) Inspection Notes.

The documentation Mr. Black provided is not consistent with their SWPPP language and does not meet the minimum requirements that are stated in the permit.

H. Quarterly Visual Assessment Procedures

Section 6.2.1 of the permit describes the quarterly visual assessment requirements as well as documentation requirements. "Once each calendar quarter for the entire permit term, the permittee must collect a storm water sample from each outfall (except as noted in Part 6.2.3) and conduct a visual assessment of each of these samples."

Although the procedure is documented in their SWPPP, according to Mr. Black the facility has not conducted quarterly visual monitoring as outlined in the permit.

I. Comprehensive Site Inspection Documentation

Section 6.3.1 of the permit describes the annual comprehensive site inspection and documentation. "A permittee must conduct annual comprehensive site inspections while covered under this permit."

Although the procedure is documented in the their SWPPP. At the time of the inspection the facility did not have documentation of an annual inspection.

J. Benchmark Monitoring

Section 7.2.1 and Section 11.Q.6 in the permit describes the benchmark monitoring requirements. Benchmark monitoring is required quarterly.

At the time of the inspection the facility provided me with the results from a sampling event on 7/28/2015. See Attachment G, 7/20/2015 Sampling Event Documentation. The facility did not have documentation of any other sampling events.

K. Analytical Results of the Benchmark Monitoring

Table 11.Q.6-1 of the permit provides the Sector Specific Benchmark Monitoring Concentration Values. Section 8.2 of the permit states that "the permittee must review the selection, design, installation, and implementation of their control measures to determine if modifications are necessary to meet the effluent limits in this permit."

This would also trigger corrective action deadlines and documentation required in Section 8.3 and 8.4 of the permit.

Section 8.2.2 of the permit states that if less than four benchmark samples have been taken, but the results are such that an exceedance of the four quarter average is mathematically certain (i.e. if the sum of the quarterly sample results to date is more than four times the benchmark level) this is considered a benchmark exceedance.

Monitoring results from the 7/20/2015 sampling event are high enough that the four quarter average is mathematically certain. See Attachment G, 7/20/2015 Sampling Event Documentation. According to the facility, no documented control measure review has occurred and the corrective action deadlines as required by the permit have not been addressed.

L. Annual Report

Section 9.2 of the permit describes the annual report requirements. "A permittee must submit an annual report to DEC that includes the findings from their Part 6.3 comprehensive site inspection and any corrective action documentation as required in Part 8.4." According to the Mr. Black, North Star has never submitted an annual report.

VIII. Closing Conference

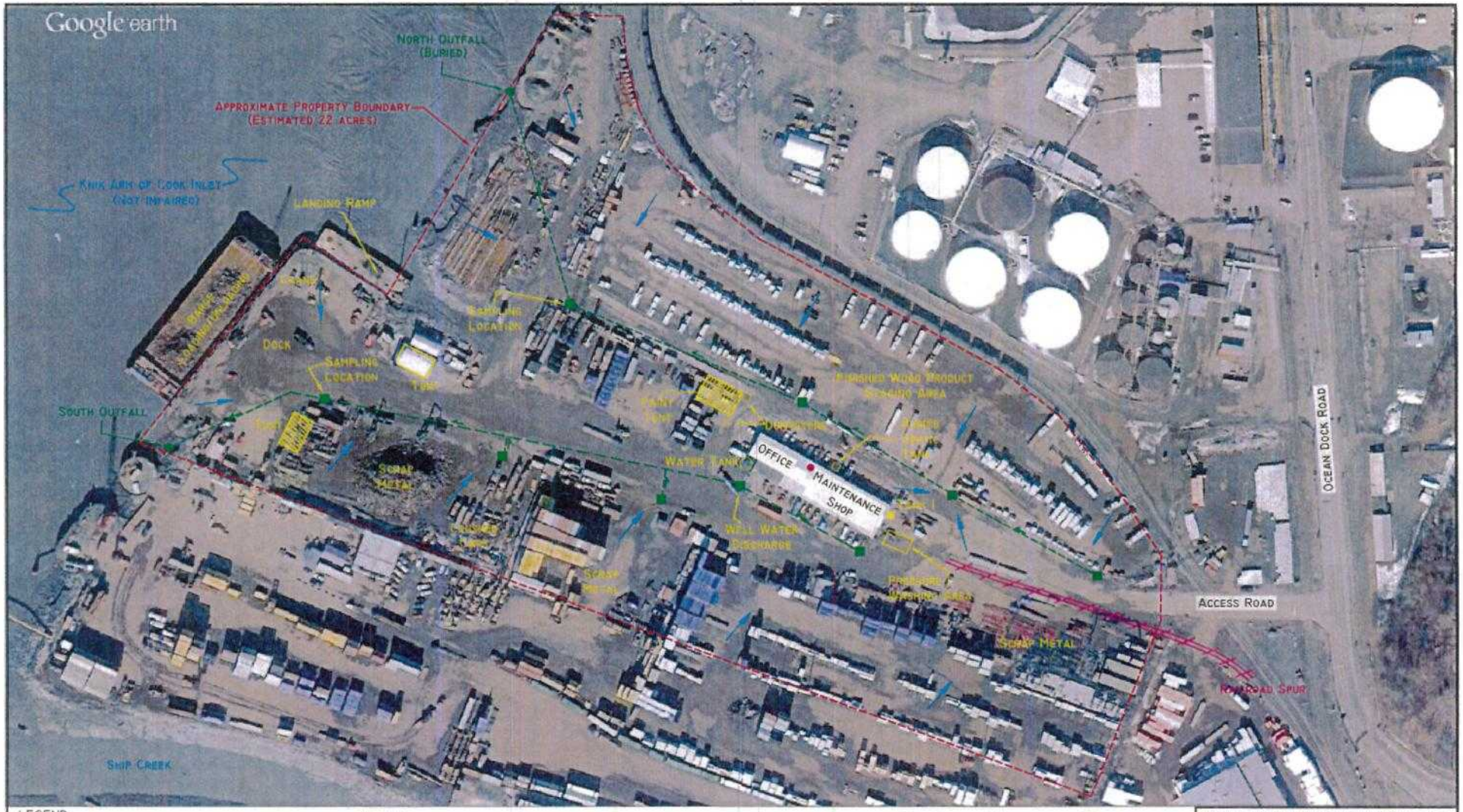
A closing conference was held with Mr. Black and Mr. Robertson to discuss our inspection observations and concerns. I then thanked them for their time and cooperation with the inspection.

Report Completion Date: 12/16/15

Lead Inspector Signature:

Attachment A

Facility Map



LEGEND

- Sheet Flow Drainage Pathway
- Underground Storm Water Conveyance and Flow Direction
- Storm Water Outfall
- Storm Water Catchbasin
- Spill Response Materials

NOTES

1. Heavy equipment (e.g., cranes, loaders, forklifts) are used for facility operations throughout the facility.
2. A mobile refueler is used for fueling heavy equipment throughout the facility.
3. Transfer, storage, and maintenance activities at all unenclosed areas of the facility may be exposed to precipitation or surface runoff.

0 50 150 300

Approximate Scale in Feet

Map adapted from aerial imagery provided by Google Earth Pro(tm), reproduced with permission granted by Google Earth Mapping Services

North Star Terminal & Stevedore Company, LLC
Anchorage, Alaska

SITE PLAN

Shannon & Wilson, Inc.

Fig. A-2

Attachment B

Facility Aerial Image (google earth)

Attachment C

10/20/15, 2/11/16, 4/19/16 Health, Safety, Environmental (HSE) Inspection Notes

Notes were provided by Mr. Black via email on 10/04/16

Klemesrud, Jon

From: Steve Black <steveb@northstarak.com>
Sent: Tuesday, October 04, 2016 5:13 PM
To: Klemesrud, Jon
Cc: Katrina Chambon (katrina.chambon@alaska.gov); Brad Robertson; Chris Vernon
Subject: North Star Terminal - meeting follow-up
Attachments: SKMBT_C45416100413330.pdf; HSE Walkthrough 2-11.docx; HSE Walkthrough 4-19.docx; 10-20-15 Walkthrough.docx; SKMBT_C45416100414540.pdf

Good afternoon Jon,

Thanks for taking the time and explaining to me what I need to do. I know I am out of compliance on several issues, but I do appreciate the professionalism. Although I have not sent in any documentation to the DEC, I do take our storm water issues seriously.

Currently North Star does not have a specific SWPPP training program, however we do have different HSE programs which cover some of the SWPPP requirements. I will develop some SWPPP specific training as per the plan.

I have attached a few examples of my HSE walk throughs, a spill protocol plan we have in place and last fall's invoice from Alaska Stormwater Maintenance for cleaning out my catch basins.

Best,
Steve

Steve Black

North Star Terminal and Stevedore Company, LLC
790 Ocean Dock Road
Anchorage, AK 99501
Ph: (907) 263-0121
Fax: (907) 272-8927
steveb@northstarak.com

HSE Walkthrough 2-11-16

1. Oil on ground back corner of shop. Needs cleaned up and Aqau Zyme applied when weather warms up.

2. Waste oil drum sitting outside of container in the weather with oil on top which is running onto the ground. Needs cleaned up and moved inside.

3. Oil on ground under new M-250. Needs cleaned and Aquazyme applied when weather warms up. Need to put duck pond or something underwork areas where oil will drip down during repairs.

4. Proper use of putting something under work to catch run-off oil.

5. The next several pictures are of garbage on the ground or items that need to be picked up.






HSE Walkthrough 4-19-2016

1. Tools left lying on the ground.

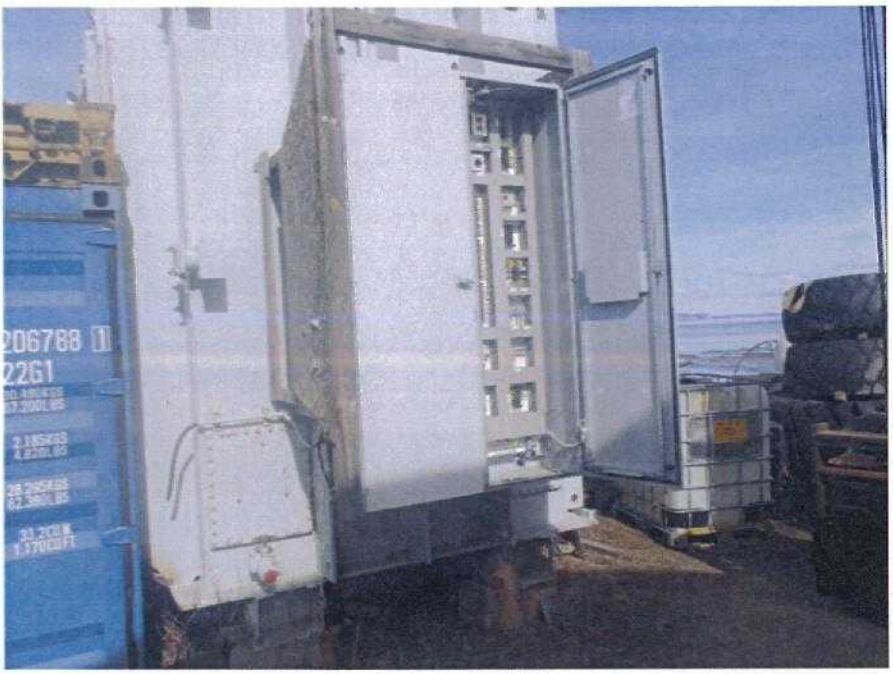
2. Waste oil containers left out in the weather. Need to be inside where rain can't wash potential oil on top into the ground. Per Mark, the two paint waste drums are to be topped off and called in for disposal by the end of the week. Whoever is shuffling waste oil tanks need to make sure all tanks are put away.

3. Banding, dunnage and miscellaneous garbage needs to be cleaned up from the yard.

4. Need to clean up around drain and put oil absorbent pads around. Put some pads in catch basin. It's a small basin and it already drains slow so at least we will catch more of the oil from the "wash bay". If it fills up too fast with mud we will try something else. We need to try something to keep the wash bay contaminants out of the storm drain. Rick/Vern, flush the drain some with the water truck. It will take a few times at it, then put some oil absorbent boom in and around the drain. Scratch out a little bit of a grove /trench around the drain so at least one ring of boom is lower than the top of the drain.

5. Oil spills are not getting cleaned up not sprayed with the AquaZyme. New year...same rules. The AquaZyme helps what does run off into the storm drain not have as negative of an effect on the environment. There are two sprayers in the shop in the room with the pressure washer. The water AquaZyme solution in the sprayer is more effective than sprinkling AquaZyme directly on spills. Start using it.

6. Door was wide open. Not sure for how long or who opened it. Regardless, when you see something open like this, take the time to close it. That goes along with equipment doors left open.



It's just a matter of time before DEC stops by for a surprise spot check like OSHA did. We need to continue the diligence we started last year and constantly improve. Every water sample I have taken has had above the standard allowable levels. I don't know if we can get down to allowable levels, but we need to try.

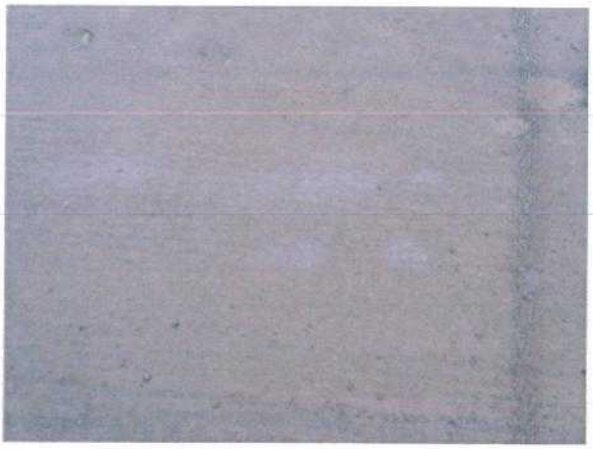
File Titled: "10-20-15 Walkthrough"

I conducted an HSE walkthrough of the yard Tuesday. Except for all the activity and stuff scattered everywhere for the paint tent transition, there has been a major improvement since my last walkthrough.

The waste oil storage was cleaned up and all the tanks (empty and full) were stored inside. Daniel, with some help, did a great job of cleaning up the storage tank area and cleaning the big oil spill off the ground.

During my inspection I noticed a substantial number of oil droplets through the yard. I followed them from the driveway to the scrap yard. Schnitzer's truck that was hauling scrap from the rail spur to the scrap pile had a hydraulic line leak. Schnitzer's mechanic (Dave) came in with the demo-dump while I was still in the yard so I pointed the oil out to him and we found the leak on the back of their green truck.

Below are some of the pictures I took through the yard. My only complaint here is why nobody else checked this out sooner? We need to be more aware of fresh oil on the ground and get to the root of the problem ASAP. As I've stated several times, our water samples are 10 times over the ADEC benchmarks. Those scrap piles are a big culprit, but not the only ones.



Attachment D

2015 Annual Cleaning Invoice

Alaska Stormwater Maintenance, Inc.
205 E Dimond Blvd. PMB #831
Anchorage Alaska 99515

INVOICE

Date	Invoice #
11/9/2015	15-6088

Bill To

NORTH STAR TERMINAL & STEVEDORE CO
790 OCEAN DOCK RD
ANCHORAGE, AK 99501

W.O. No.	P.O. No.	Terms
ASM 15-560		Net 30

Description	Quantity	Rate	Amount
LOCATION: NORTH STAR YARD POA			
0930-1230 10.30.15 - VACTOR WITH (2) MAN CREW - CLEAN BASINS (COULD NOT CLEAN SOME DUE TO HIGH TIDE)	3	330.00	990.00
10.30.15 - DUMP FEE PER LOAD	1	250.00	250.00

Thank you for your business.

Total $1,240.00

Phone #	Fax #	E-mail
907-344-2576		Office@AKStormwater.com

Attachment E

Photo Log

Photo Log – North Star Terminal & Stevedore Co.

Photo #:01
Description: Facing west. Photo of a material storage area from the east corner of the property near the entrance to the facility.

Photo #:02
Description: Photo of the north east catch basin. This catch basin is the first in a series of four catch basins that combine and discharge to the north outfall.

Photo #:03
Description: Facing west, photo of the finished lumber storage area. According to the facility this area is subleased by Bernard's Builder Supply. Stormwater from this area is primarily infiltrated. Camera Photo DSCN1141.

Photo #:04
Description: Facing east, photo of the finished lumber storage area. According to the facility, this area is subleased by Bernard's Builder Supply. Stormwater from this area is primarily infiltrated. Camera Photo DSCN1142.

Photo Log – North Star Terminal & Stevedore Co.

Photo #:05
Description: Photo of a catch basin with inlet cover just north of the main office. This catch basin is the third in a series of four catch basins that combine and discharge to the north outfall. Camera Photo DSCN1143.

Photo #:06
Description: Facing east, photo of a catch basin with inlet cover just north of the main office. This catch basin is the third in a series of four catch basins that combine and discharge to the north outfall. Camera Photo DSCN1144.

Photo #:07
Description: Facing west, photo of covered dumpsters located just west of the main office. Camera Photo DSCN1145.

Photo #:08
Description: Facing east, photo of the area near the fourth and last catch basin in the series of catch basins that discharge to the north outfall. This catch basin also the designated sampling location for the north outfall. The catch basin is located just left of the parked red vehicle. Camera Photo DSCN1146.

Photo Log – North Star Terminal & Stevedore Co.

Photo #:09
Description: Facing west, photo of a subleased area used for material storage. Camera Photo DSCN1147.

Photo #:10
Description: Facing west, photo of the just east of the loading ramp and northeast of the dock. This area acts as dredging access for the facility's bulldozer. The facility provided me with U.S. Army Corps of Engineer dredging permit. Camera Photo DSCN1148.

Photo #:11
Description: Facing south, photo of the area that was historically subleased to Schnitzer Steel for scrap metal storage. Camera Photo DSCN1149.

Photo #:12
Description: Facing west, photo of activity occurring during the inspection. Loading of scrap metal to a barge at the dock. Camera Photo DSCN1150.

Photo Log – North Star Terminal & Stevedore Co.

Photo #:13
Description: Facing northeast, photo of a catch basin near the loading dock. This catch basin is the final one in a series of five that discharge to the south outfall. This is also the sampling location for the south outfall. Camera Photo DSCN1151.

Photo #:14
Description: Facing west, photo of a catch basin near the loading dock. This catch basin is the final one in a series of five that discharge to the south outfall. This is also the sampling location for the south outfall. Camera Photo DSCN1152.

Photo #:15
Description: Facing south near the loading dock, photo of the location of the south outfall. The outfall is a pipe underwater that discharges to Knik Arm of Cook Inlet. According to the facility you can view the pipe during low tide. Camera Photo DSCN1153.

Photo #:16
Description: Facing west, photo of fork lift staging area, this area is located just east of the loading dock. DSCN1154.

Photo Log– North Star Terminal & Stevedore Co.

Photo #:17
Description: Facing east, photo of the area that was historically subleased to Schnitzer Steel for scrap metal storage. Camera Photo DSCN1155.

Photo #:18
Description: Facing south, photo of the area that was historically subleased to Schnitzer Steel for scrap metal storage. A catch basin is located under the wood pallet near the white boom. This catch basin discharges to the south outfall. Camera Photo DSCN1156.

Photo #:19
Description: Facing south, photo of a catch basin along the southern end of the facility near a material storage area. This catch basin discharges to the south outfall. Camera Photo DSCN1157.

Photo #:20
Description: Facing west, photo of a catch basin along the southern end of the facility near a material storage area. This catch basin discharges to the south outfall. Camera Photo DSCN1158.

Photo Log– North Star Terminal & Stevedore Co.

Photo #:21
Description: Facing north, photo of the hose discharging Class C Drinking Well Water to the stormwater catch basin. According to the facility this is a continuous discharge. Camera Photo DSCN1159.

Photo #:22
Description: Photo of a material storage area. The drums pictured were empty at the time of inspection. Camera Photo DSCN1160.

Photo #:23
Description: Facing east, photo of the southeast storage area and ponded water at this location. Camera Photo DSCN1161.

Photo #:24
Description: Facing southwest, photo of the southeast catch basin near the pressure washing area. Camera Photo DSCN1162.

Photo Log– North Star Terminal & Stevedore Co.

Photo #:25
Description: Facing north, photo of the pressure washing area on the east end of the maintence shop. Camera Photo DSCN1163.

Photo #:26
Description: Facing northeast photo of the facility's paint shed. Camera Photo DSCN1164.

Photo #:27
Description: Photo of inside a shipping crate used for material storage. This area was near the south end of the maintence shop. Camera Photo DSCN1165.

Photo #:28
Description: Photo of inside a shipping crate used for material storage. This area was near the south end of the maintence shop. Camera Photo DSCN1166.

Attachment E

North Star SWPPP (w/o attachments)

Storm Water Pollution Prevention Plan (SWPPP) North Star Terminal & Stevedore Company, LLC Anchorage, Alaska

July 2015

Submitted To:

North Star Terminal & Stevedore Company, LLC
790 Ocean Dock Road
Anchorage, Alaska 99501

By:

Shannon & Wilson, Inc.
5430 Fairbanks Street, Suite 3
Anchorage, Alaska 99518
Phone: (907)561-2120
Fax: (907)561-4483
www.shannonwilson.com

32-1-17740

TABLE OF CONTENTS

TABLES

Page

APPENDICES

STORM WATER POLLUTION PREVENTION PLAN (SWPPP)
NORTH STAR TERMINAL & STEVEDORE COMPANY, LLC
ANCHORAGE, ALASKA

1.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

This document represents the Storm Water Pollution Prevention Plan (SWPPP) for the North Star Terminal & Stevedore Company, LLC (NSTS) facility (the facility), located in Anchorage, Alaska. Shannon & Wilson, Inc. prepared this SWPPP for the NSTS facility to comply with the requirements for coverage under the Alaska Department of Environmental Conservation's (ADEC) Multi-Sector General Permit for Storm Water Discharges Associated with Industrial Activity (MSGP) (Alaska Pollutant Discharge Elimination System [APDES] General Permit No. AKR060000), for storm water discharges and allowable non-storm water discharges to the Knik Arm of Cook Inlet. Storm water discharges for this facility were previously covered by MSGP permit coverage under APDES Permit Tracking Number AKR05DC50.

This plan was prepared in accordance with the requirements for Sector Q (Subsector Q1), Water Transportation (primary Standard Industrial Classification [SIC] code 4491). The plan will be modified and re-certified (see Sections 6 and 7) as necessary based on significant changes in the design, operation, or maintenance of the facility, occurrence of unauthorized discharge events (e.g., spills), observations made during inspections, and implementation of corrective actions.

1.1 Facility Information

1.1.1 Facility Location

The facility is located at 790 Ocean Dock Road, Anchorage, Alaska, at approximately 61°13'42" North Latitude and 149°53'44" West Longitude as determined using Google Earth. The facility is a level, gravel pad leased from the Alaska Railroad Corporation (ARRC). A map depicting the general location of the facility is included in Appendix A as Figure A-1. The facility is not located on Native American owned lands and is not a federal facility.

The facility is a marine shipping and distribution facility, and is comprised of a dock, cargo storage areas, vehicle/equipment storage areas, a paint tent, a maintenance shop, and an office building. A 376-foot long series of sheet metal cofferdams comprise the dock, and a 150-foot long module loading berth/landing craft ramp is present at the facility. The facility operates and maintains cranes, forklifts, loaders, and dozers. The estimated area of industrial activity at the facility exposed to storm water is approximately 22 acres. A site map depicting the facility with the general facility layout is included in Appendix A as Figure A-2.

1.1.2 Discharge Information

The majority of the approximately 22 acre industrial site is a permeable gravel drive and storage areas for cargo and marine transportation equipment. The remaining portion of the site consists of associated buildings (e.g., paint tent, maintenance shop, and office building). Industrial storm water discharges into catch basins present in the facility yard which connect into two drainage culverts which convey water west towards Knik Arm. There are two discharge points, designated Outfalls North and South, located on the northwest and southwest ends of the facility, respectively, and which are the only outfalls at the facility. For the remainder of the property, storm water discharges by sheet flow and infiltrates on site in the permeable gravel surfaces.

Based on a review of the ADEC's 2010 Section 303(d) list of Alaska's Impaired Waters, the Knik Arm of Cook Inlet is not identified as an "impaired" water body, and the facility does not discharge storm water into an MS4 storm water conveyance system. The facility's storm water discharges are not subject to effluent guidelines.

1.1.3 Covered Storm Water Discharges

Discharges from this site are covered under MSGP Sector Q for "Water Transportation" industrial activities. The MSGP does not authorize the discharge of bilge and ballast water, sanitary wastes, pressure wash water, and cooling water originating from vessels. Such discharges must be authorized under a separate APDES permit, discharged to a sanitary sewer in accordance with applicable industrial pretreatment requirements, or recycled on-site. It also does not cover new construction activities which disturb one acre of ground surface.

1.2 Contact Information/Responsible Parties

Facility Operator/Owner:

Name:	North Star Terminal & Stevedore Company, LLC
Contact:	Brad Robertson, State Operations Manager
Address:	790 Ocean Dock Road
City, State, Zip Code:	Anchorage, Alaska 99501
Email Address:	bradr@northstarak.com
Telephone Number:	(907) 263-0169

SWPPP Contact:

Name:	North Star Terminal & Stevedore Company, LLC
Point of Contact:	Steve Black, Facility Manager
Address:	790 Ocean Dock Road
City, State, Zip Code:	Anchorage, Alaska 99501
Email Address:	steveb@northstarak.com
Telephone Number:	(907) 263-0121

1.3 Storm Water Pollution Prevention Team

TABLE 1
STORM WATER POLLUTION PREVENTION TEAM

Team Member Titles	Team Member Responsibilities
Manager, State Operations	Ensuring implementation of the plan and best management practices, and reviewing recordkeeping and sampling data.
Manager, Facility	Day-to-day activities at the facility. Also responsible for conducting assessments and inspections, collecting monitoring samples, implementing recordkeeping requirements, completing site reports, and implementing best management practices.
Staff at NSTS facility	Implementation of best management practices.

1.4 Activities at the Facility

The facility provides marine terminal services to barges and marine support vessels. The primary facility operations include stevedoring operations, equipment maintenance and mobilization, and land and equipment leasing. Services include offloading barges with materials and goods for distribution throughout the state and loading materials for transport down to the contiguous United States. Other barge services rely on NSTS to provide spring and fall loading/offloading services to transport materials to and from numerous Alaskan bush communities. The facility also provides off-dock crane services to clients throughout Alaska as North Star Equipment Services (NSES). Equipment and other supplies associated with marine transportation and equipment maintenance (e.g., cranes, forklifts, etc.) are stored and maintained at the facility.

The facility stores bulk volumes of ultra-low sulfur diesel (ULSD) fuel for on-site distribution to equipment. The facility also stores and handles 55-gallon drums and portable totes (110 and 240 gallons) of new oil lubricants used for on-site maintenance activities, and two 275-gallon used oil portable totes. Used oil is burned on site in a used oil burner located in the maintenance shop. Used antifreeze is stored in the maintenance shop before being transported off site for proper disposal.

Several areas of the facility are sub-leased to various companies for storage of containerized cargo, scrap metal, industrial and residential building materials, tools, sheds, trailers, heavy and light duty equipment, and finished wood products.

1.5 General Location Map

A vicinity map showing the facility location is included in Appendix A as Figure A-1.

1.6 Site Maps

A site map showing features of the facility and receiving waters is included in Appendix A as Figure A-2. The figures are organized as follows:

TABLE 2
INDEX OF SITE MAPS IN APPENDIX A

Figure Number	Title	Summary
A-1	Vicinity Map	Location of facility and nearby water bodies
A-2	Site Plan	General location of the NSTS facility; drainage flow direction

2.0 POTENTIAL POLLUTANT SOURCES

2.1 Industrial Activity and Associated Pollutants

The following table references the industrial activities at the facility which may be exposed to storm water and/or runoff (i.e. activities conducted in outdoor areas) and the potential storm water contaminants associated with those activities.

TABLE 3
INDUSTRIAL ACTIVITY AND POTENTIAL CONTAMINANTS

Activity	Location	Associated Pollutants
Pressure Washing	Outside Maintenance Shop	Paint solids, oil, grease, heavy metals, suspended solids, and debris
Surface preparation, paint removal, and sanding	Paint Tent	Spent abrasives, paint solids, heavy metals, dust, and debris
Painting	Paint Tent	Paint solids, spent solvents, heavy metals, dust, and debris
Engine maintenance and repairs	Maintenance Shop and Facility Yard	Spent solvents, oil, heavy metals, ethylene glycol, acid/alkaline wastes, detergents, and batteries
Material handling (including loading/unloading, fueling, storage, and disposal)	Dock, Facility Yard, and Maintenance Shop	Fuel, oil, grease, heavy metals, spent solvents, debris

The potential for pollutants to come in contact with storm water or runoff is primarily mitigated using the practice of storing materials in covered areas or inside when not in use. Vehicle/equipment maintenance is conducted indoors in the maintenance shop when practicable, and storage areas are routinely inspected for signs of leaks and drips from adequately maintained vehicles and equipment.

2.2 Spills and Leaks

Five ASTs are associated with the facility, and have been designated Tanks 1 through 5 for the purposes of this plan. The following table summarizes the tanks on site and gives their approximate location. The general locations of the tanks are shown on Figure A-2.

TABLE 4
ABOVEGROUND TANKS AND CONTENTS

Tank Number	Location	Contents and Use
1	Outside Maintenance Shop	500-gallon double-walled ULSD dispenser tank
2	Facility Yard	2,500-gallon ULSD mobile refueler
3 & 4	Inside Maintenance Shop	250-gallon used oil tanks associated with the used oil burner
5	Inside Maintenance Shop	500-gallon single wall used oil separator tank
-	Inside Maintenance Shop	55-gallon drums and portable totes of oil lubricants and used oil portable totes

Portable containment basins are used under large equipment stored outside and during fuel transfers on the barges. The 55-gallon drums and portable totes of new and used oil lubricants are stored in the maintenance shop.

In the last three years, no reportable quantity spills have occurred at the facility. A spill reporting form is provided in Appendix B for documenting future spills.

2.3 Non-Storm Water Discharges Documentation

The facility is authorized to discharge selected non-storm water or storm water mixed with the authorized non-storm water. Authorized non-storm water discharges that may be applicable to this facility include:

- Discharges from fire-fighting activities.
- Potable water, including water line flushing.
- Landscaping watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with the approved labeling.
- Pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spill materials have been removed).
- Routine building washdown that does not use detergents.
- Uncontaminated groundwater or spring water.
- Foundation or footing drains where flows are not contaminated with process materials.

The following non-storm water discharges are not authorized by this permit: discharges associated with construction activities, and the discharge of bilge and ballast water, sanitary wastes, pressure wash water, and cooling water originating from vessels. Discharges of uncontaminated groundwater from an on-site Class C drinking water well were observed during the June 25, 2015 site visit. No unauthorized non-storm water discharges were observed during the June 25, 2015 site visit. Equipment washing is conducted in the summer months outside of the maintenance shop in an area where wash water infiltrates the permeable gravel pad and does not discharge off site. Sanitary wastes are collected in an underground septic system, which is pumped regularly to prevent overflow and transported off site for proper disposal.

2.4 Salt Storage

Salt or salted sand is not stored at the site.

2.5 Sampling Data Summary

There has been no previous storm water sampling performed at this facility.

3.0 STORM WATER CONTROL MEASURES

The activities associated with water transportation may result in precipitation coming in contact with metals, fuels, or oily wastes. Pollutants in storm water discharges from industrial areas may be reduced using the following methods: eliminating pollution sources, minimizing exposure, implementing best management practices (BMPs) to prevent pollution, using traditional storm water management practices, and providing end-of-pipe treatment.

3.1 Minimize Exposure

Controls and practices have been instituted at the facility to reduce the exposure of industrial areas to rain, snow, snowmelt and runoff. The primary methods to reduce contact of storm water include storing potential pollutants inside, conducting maintenance activities inside, and covering waste receptacle bins. There are no floor drains located in the maintenance shop or paint tent. The following structural controls and practices are implemented to minimize exposure:

- 55-gallon drums and portable totes of oil lubricants are located within the maintenance shop.
- The dumpster lids are kept closed, and other waste receptacle bins are stored inside.
- Portable containment basins and/or sorbent pads are placed under hose connections when fueling equipment on the barges, and under large equipment during outside storage or maintenance activities.
- Painting is conducted inside whenever practicable.
- Solvent and paint mixing is conducted in areas not exposed to storm water.

3.2 Good Housekeeping

Good housekeeping consists of routine maintenance to keep a clean and orderly work environment. A clean and orderly work area reduces the possibility of accidental spills with subsequent discharge into receiving waters and reduces the potential exposure of personnel to safety hazards.

The facility will continue litter control procedures to keep their areas free of debris that might otherwise enter the Knik Arm. This effort is particularly important during spring breakup, when the accumulated debris of the winter begins melting out of the snow and ice. The following good housekeeping practices are implemented to keep exposed areas of the facility clean:

- All outdoor work areas are cleaned after the completion of tasks; waste is not left exposed to storm water.
- All wastes are stored inside or in appropriate outdoor waste receptacle bins (e.g., lidded dumpsters).
- Collected wastes (e.g., spent paints and solvents, used antifreeze, etc.) is disposed of by a licensed waste disposal company (NRC Alaska).
- Oily wastes are segregated from regular trash; oily waste is double-bagged prior to being moved to the facility's dumpster.
- Portable containment basins and/or sorbent pads are placed under large equipment during outdoor storage and/or maintenance.
- Drain fluid from parts (e.g., oil filters) prior to disposal.
- Waste batteries are stored inside and recycled off-site.
- Leaks and spills are cleaned up promptly, and dry methods (e.g., absorbent pads and absorbent powder) are used whenever practicable.
- Wet cleanup practices are not used at the facility.

In addition to the schedule for the regular pickup and disposal of waste material at the end of each task, routine inspections for leaks, and the general condition of drums, tanks, pipes, and containers are performed daily. Additional monthly assessments of the potential pollutant sources are conducted by the Facility Manager.

Applicable sector-specific good housekeeping requirements are listed in Section 3.9.

3.3 Maintenance

The Facility Manager is responsible for the operation and maintenance of the site. Maintenance requirements that may be associated with storm water and pollution control include:

- Inspect, test, and maintain all pollution control measures (e.g., automatic shutoffs on dispenser nozzles) and replace or repair as soon as practicable after discovering any failures or potential failures with these control measures.
- Test overfill prevention device (e.g., clock gauge), and inspect and maintain all bulk storage containers including associated piping and valves to avoid spills, leaks, and other releases.
- Inspect vehicles, vessels, and other equipment for leaks, and repair leaks as soon as possible.
- Inspect storm water accumulated in portable containment basins prior to discharge, and keep drainage valves closed or plugged.
- Ensure facility spill kits and other response materials are restocked or refilled.
- Inspect the various maintenance and storage areas for accumulated storm water, oil or other pollutants, and factors that would increase the likelihood of discharge.
- Cleanup and the placement of absorbents to prevent the drainage of oil, solvents, and other materials into Knik Arm.

3.4 Spill Prevention and Response

Discharge prevention measures include the use of double-walled ASTs and overfill prevention devices (i.e. direct-read gauges and/or flow cutoff switches). In addition to the structural controls to minimize the exposure of pollutants to storm water outlined in Section 3.1 above, the following procedures are implemented at the facility to minimize the potential for leaks, spills, and other releases:

- Containers susceptible to spillage or leakage are properly labeled identifying the contents of the container, and maintained to prevent contamination of storm water.
- Spill response materials (i.e. spill kits and floating booms) are stored at the facility in the maintenance shop.
- Spill prevention elements (e.g., corrosion protection, overfill prevention, tank construction and placement, leak detection, piping, and dispensers) are routinely inspected.
- Outdoor lighting provides visibility of the ground surface after dark.
- Employees who may cause, detect, or respond to a spill or leak are trained (depending on job classification) as to their role in responding to or cleaning up such spills and leaks.

Phone numbers for the facility manager, operations manager, emergency services, and appropriate agencies are listed below.

TABLE 5
EMERGENCY RESPONSE CONTACT NUMBERS

Contact	Day Phone	Emergency Phone
Facility Manager: Steve Black	(907) 263-0121	(907) 227-9920
State Operations Manager: Brad Robertson	(907) 263-0169	(907) 229-7521
Hospital: Alaska Regional Hospital	(907) 276-1131	(907) 264-1222
Alaska Dept. of Environmental Conservation (ADEC)	(907) 269-3063	1-800-478-9300
US Coast Guard	-	(800) 478-5555
EPA Region 10 – Alaska Operations	907-271-5083	1-206-553-1263
National Response Center	-	1-800-424-8802

For each spill reported, the following information will be recorded as appropriate:

1. Facility address and phone number;
2. Location, date, and time of spill;
3. Type and estimated volume of oil spilled;
4. Discharge source(s);
5. Cause of the spill;
6. Known and potentially impacted media;
7. Damages and/or injuries caused by the release;
8. Who reported the spill and what agencies and organizations have been notified;
9. Cleanup, disposal and site remediation actions; and
10. ADEC Spill Number and/or RECKEY Number (if appropriate).

In accordance with 18 AAC 75.300 and 40 CFR 110, discharges of oil or hazardous substances must also be reported to the ADEC and the NRC, respectively. Copies of the ADEC's spill reporting notification form, oil and hazardous materials incident final report, monthly oil spill reporting log, and spill reporting placards are included in Appendix B. A summary of the ADEC notification requirements is listed below.

Discharge to Water

Notify ADEC and NRC immediately of any discharge of oil or hazardous substance to water.

Discharge to Land

In the event of a release to land, notify ADEC in accordance with the following schedule:

Any release of oil in excess of 55 gallons must be reported as soon as the person has knowledge of the discharge;

Any release of oil in excess of 10 gallons but less than 55 gallons must be reported within 48 hours after the person has knowledge of the discharge;

The Facility Manager shall maintain, and provide to ADEC on a monthly basis, a written record of any discharge of oil from 1 to 10 gallons. The monthly oil spill reporting log is included in Appendix B.

3.5 Erosion and Sediment Controls

The site is generally covered with compacted gravel limiting erosion potential. The shoreline is armored with riprap.

3.6 Management of Runoff

Numerous catch basins are present in the facility yard which connect into the two drainage culverts. Sausage booms are placed around the catch basins to prevent debris from entering the drains. Other storm water management includes slowing runoff and promoting storm water infiltration and evaporation.

3.7 Salt Storage Piles or Piles Containing Salt

Salt or salted sand is not stored at the site.

3.8 Sector-Specific Non-Numeric Effluent Limits

The MSGP requires sector-specific technology based effluent limits to be implemented to minimize the contamination of precipitation or surface runoff. The requirements of Sector Q, which are applicable to this facility and the practices used to meet these requirements, are listed below:

TABLE 6
ADDITIONAL TECHNOLOGY-BASED EFFLUENT LIMITS

Potential pollutant source	Practice or control measures
Pressure Washing Area	Pressure washing is conducted on equipment in a designated area outside of the maintenance shop in the summer months when the wash water can infiltrate into the unpaved ground surface. Pressure washing to removed marine growth from vessels is not conducted at the facility.
Blasting and Painting Area	Abrasive blasting and painting activities are performed in the paint tent when possible. Containerized materials are labeled and stored inside the paint tent when not in use. An organized inventory of materials used at the facility is maintained.
Material Storage Areas	Containerized materials are stored in protected, secured locations away from shorelines or inside when possible. Portable totes and 55-gallon drums of oil lubricants are stored inside in the maintenance shop (no floor drains present in shop).
Engine Maintenance and Repair Areas	Engine maintenance and repair are performed indoors when possible. An organized inventory of materials used in the shops is maintained.
Material Handling Area	Cargo is containerized or covered in plastic sheeting as practicable. Mixing paints and solvents are conducted inside the paint tent.
Drydock Activities	Drydocks are not utilized at the facility.
Storm Water Diversions	Numerous catch basins are present in the facility yard which connect into the two drainage culverts to convey water away from the work areas.
Velocity Dissipation Devices	The on-site storm water conveyance system consists of underground culverts. The outfalls discharge onto shorelines armored with riprap.

3.9 Employee Training

At least once per year, all maintenance personnel shall attend a training session that addresses the requirements of this SWPPP. This training, at a minimum, will address:

- Used oil and spent solvent management.
- Proper disposal of spent abrasives and vessel wastewaters.
- Spill prevention and control, including spill reporting.
- Fueling procedures.
- General good housekeeping practices.
- Proper painting procedures.
- Used battery management.
- The Storm Water Pollution Prevention Team structure and responsibilities.
- The duty to informally inspect the area whenever on site for potential pollution sources as part of their good housekeeping responsibilities and BMPs.

The training, or a refresher, is provided annually.

3.10 Non-Storm Water Discharges

Site inspections by the Facility Manager or qualified trained person will verify unauthorized discharges are not being conducted. Any authorized non-storm water discharges observed shall be noted, documented, and a corrective action plan be prepared and implemented to stop unauthorized discharges. After corrective action is completed, the plan will be amended and signed by the State Operations Manager indicating that the measures are in place and that similar non-storm water discharges will be prevented in the future. The final signed plan will be kept with this plan.

3.11 Waste, Garbage, and Floatable Debris

Waste, garbage, and floatable debris will be picked up on an as-needed basis. It is the responsibility of each employee to identify and remove litter from the facility. The dumpsters in the facility yard will be closed and covered, such that the contents will not be in contact with storm water.

3.12 Dust Generation and Vehicle Tracking of Industrial Materials

During the summer months, a NSTS-owned water truck is used to sprinkle uncontaminated groundwater onto the ground surface in the heavy traffic areas of the facility. There is no discharge from the sprinkling dust control BMP. Vehicles at the facility are operated at safe speeds in accordance with all applicable speed limits. By moistening the driveways and traveling at reduced speeds, vehicle generation of dust is minimized.

3.13 Corrective Actions

If any of the following conditions occur, a corrective action review will be conducted and documented using Section IV (Corrective Actions) of the Comprehensive Site Inspection Form included in Appendix B:

- An unauthorized release or discharge (e.g., spill, leak) occurs at the facility;
- An inspection or assessment reveals that facility pollution control measures are not being properly operated and maintained or that modifications to facility control measures are necessary;
- Construction or a change in design, operation, or maintenance at the facility changes the nature or increases the quantity of pollutants discharged in storm water from the facility; or
- The average of four quarterly sampling results exceeds an applicable benchmark, or if less than four benchmark samples have been taken, but the results are such that an exceedance of the four quarter average is mathematically certain (i.e., if the sum of quarterly sample results to date is more than four times the benchmark level).

Within 24 hours of the discovery of one of the conditions outlined above, a member of the facility storm water pollution prevention team will complete parts three (identification of the conditions triggering the need for the review) through six (how problem identified) of Section IV of the Comprehensive Site Inspection Form. Within 14 days of discovery of one of the conditions outlined above, a member of the facility's storm water pollution prevention team will complete parts seven (description of corrective actions) through eleven (status of corrective action and steps remaining to completion) of Section IV of the Comprehensive Site Inspection Form.

Records of corrective action reviews (Section IV of the Comprehensive Site Inspection Form) will be submitted to the ADEC with the remainder of the Comprehensive Site Inspection Form, and the completed records will be maintained in Appendix C of this plan.

4.0 SCHEDULES AND PROCEDURES MONITORING

Benchmark sampling is required for coverage under the MSGP for Sector Q facilities. The facility's storm water pollution prevention team conducts benchmark monitoring of storm water discharges from the facility for total aluminum, total iron, total lead, and total zinc. The parameters used in the benchmark monitoring are independent of hardness since the facility's receiving waters (Knik Arm of Cook Inlet) are considered saline water. Saltwater benchmark values are presented in Table 11.Q.6-1 of the 2015 MSGP included as Appendix D.

Storm water discharges from the facility occur at two discharge points, designated Outfalls North and South, which discharge onto the mudflats and directly into Knik Arm. These discharge points are not safely accessible; therefore benchmark samples will be collected from the catch basin located prior to each outfall.

Benchmark sampling will be conducted after a "measurable storm event." For the purposes of this plan, a measurable storm event is defined as a storm event that results in an actual discharge from the facility that follows the preceding measurable storm event by at least 72 hours (three days). Rainfall data will be obtained from http://pafc.arh.noaa.gov/climate.php or other appropriate climate source. In the case of snowmelt, sampling will be conducted at a time when a measurable discharge occurs at the facility. If possible, at least one benchmark monitoring sample will be a sample of snowmelt running off of the facility.

Benchmark sampling will be conducted using the following procedure:

- A rainwater runoff grab sample will be collected within the first 30 minutes of a discharge produced from a measurable storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes and it must be documented why it was not possible to take samples within the first 30 minutes. A snowmelt grab sample will be collected during a period with a measurable discharge.
- The benchmark monitoring sample will be collected in laboratory-prepared sample containers following any directions included with those sample containers, and will be submitted to the laboratory for analysis as soon as possible after they are collected.
- The MSGP Industrial Discharge Monitoring Report (MDMR), included in Appendix B, will be completed during each benchmark sampling event.

Benchmark sampling at the facility will be conducted in accordance with the alternative schedule provided in Appendix E, which establishes four periods during the year when storm water discharges are likely. Benchmark sampling may be conducted coincident to the quarterly visual assessment.

The completed MDMR will be submitted to the ADEC no later than 30 days after receiving the laboratory results. For each benchmark sampling event, except snowmelt sampling, a member of the facility's Storm Water Pollution Prevention Team will document the date and duration (in hours) of the rainfall event, rainfall total (in inches) for that rainfall event, and time (in days) since the previous measurable storm event. For snowmelt, the date of sampling will be documented. Note that if no discharge occurs during the benchmark monitoring period, a member of the facility's Storm Water Pollution Prevention Team will report no discharge for that monitoring period to the ADEC. Copies of each completed MDMR will be maintained in Appendix C of this plan.

If conditions prevent obtaining four samples in these four consecutive quarters, benchmark sampling will continue until achieving four samples required for calculating the benchmark monitoring average. If the average benchmark concentration exceeds the benchmark criteria or it is mathematically certain the criteria will be exceeded for these metals, corrective actions should be implemented to reduce pollutant discharges and an additional year of samples collected as outlined in Part 7.2.1.4 of the 2015 MSGP.

Annual effluent limitations guidelines monitoring and impaired waters monitoring are not required for coverage under the MSGP for Sector Q facilities.

5.0 INSPECTIONS

5.1 Routine Facility Inspections

The routine facility inspections will be conducted on a quarterly-basis in areas of the facility where industrial materials or activities are exposed to storm water, and of all storm water control measures. Additional sector-specific areas – include pressure washing areas; blasting, sanding and painting areas, material handling and storage areas, engine maintenance and repair areas; and the general yard – will be included in the routine facility inspections. The following information will be documented on the Storm Water Industrial Routine Facility Inspection Report presented in Appendix B.

- The inspection time and date;
- The name and signature of the inspector;
- Weather information and a description of any discharges observed;
- Previously unidentified discharges of pollutants;
- Control measures needing maintenance;
- Failed control measures that need replacement; and
- Additional control measures required to comply with the permit requirements.

The routine facility inspections will be conducted during periods when the facility is in operation and by a qualified person as defined in Appendix A of the 2015 MSGP with at least one member of the Storm Water Pollution Prevention Team. At least one of the routine inspections will be conducted during a storm water discharge from a measurable storm event. Completed forms will be maintained in Appendix C.

A MSGP inspection schedule is included in Appendix E. The routine facility inspections will be conducted at least once in each of the following three-month intervals:

- January 1 – March 31
- April 1 – June 30
- July 1- September 30
- October 1 – December 31

5.2 Quarterly Visual Assessment of Storm Water Discharges

Visual assessments of storm water discharges will be conducted by the Facility Manager, or their designee, and documented using the MSGP Quarterly Visual Assessment Form presented in Appendix B. Completed forms will be maintained in Appendix C.

The visual assessment must be made:

- Of a sample in a clean, clear glass, or plastic container, and examined in a well-lit area;
- On samples collected within the first 30 minutes of an actual discharge from a measurable storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes and it must be documented why it was not possible to take samples within the first 30 minutes. At least one visual assessment should attempt to capture snowmelt discharge. In the case of snowmelt, samples must be taken during a period with a measurable discharge from the facility; and
- For storm events, on discharges that occur at least 72 hours (3 days) from the previous discharge. The 72-hour (3-day) storm interval does not apply if able to document that less than a 72-hour (3-day) interval is representative for local storm events during the sampling period.

Visual assessment samples will be collected from the sample locations described above in benchmark monitoring (Sampling Locations North and South) using the alternative schedule in Appendix E. The visual assessment samples may be collected immediately before or after collecting a benchmark monitoring sample in a separate container. The visual assessment sample will be allowed to sit for approximately 30 minutes before evaluating the sample for settled solids, and then the sample container will be gently shaken before evaluating the sample for foam.

The samples will be visually inspected for the following water quality characteristics:

- Color;
- Odor;
- Clarity;
- Floating solids;
- Settled solids;
- Suspended solids;
- Foam;
- Oil sheen; and
- Other obvious indicators of storm water pollution.

At a minimum, this assessment must document the following:

- Sample locations(s), if sampling was conducted;
- Sample collection and time, and visual assessment date and time for each sample;
- Personnel collecting the sample and performing visual assessment, and their signature(s);
- Nature of the discharge (runoff or snowmelt);
- Results of observations of storm water discharge (e.g. presence of sheen, sediment);
- Probable sources of any observed storm water contamination; and
- If applicable, why it was not possible to take samples within the first 30 minutes.

5.3 Annual Inspections

An annual storm water system inspection shall be conducted and documented. The documentation of the inspection is to be submitted with the annual report form provided in Appendix B. At a minimum, the documentation of the annual inspection must include:

- The date of the inspection;
- The name(s) and title(s) of the personnel making the inspection;
- Findings from the examination of the following:
    - Industrial material, residue, or trash that may have or could come in contact with storm water;
    - Leaks or spills from industrial equipment, drums, tanks, or other containers;
    - Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site;
    - Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas; and
    - Control measures needing replacement, maintenance, or repair;
- All observations relating to the implementation of control measures, including:
    - Previously unidentified discharges from the site;
    - Previously unidentified pollutants from existing discharges;
    - Evidence of pollutants entering the drainage system;

  - Evidence of pollutants discharging to receiving waters to near facility outfalls;
- Additional control measures needed to address any conditions requiring corrective action identified during the inspection.
- Any required revisions to the SWPPP resulting from the inspection;
- Any incidence of noncompliance observed or a certification stating the facility is in compliance with the permit; and
- A statement, signed and certified in accordance with the following:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

- probable sources of any observed storm water contamination; and
- if applicable, why it was not possible to take samples within the first 30 minutes.

The annual comprehensive inspection may be used as one of the routine quarterly inspections if components of both inspections are included. The MSGP inspection schedule is included in Appendix E.

5.4 Recordkeeping

To document compliance with the MSGP and this SWPPP, the following records will be maintained by NSTS for at least 3 years beyond the Notice of Termination or the expiration of the permit:

- Copy of the Notice of Intent (NOI) submitted to ADEC and any documentation exchanged between NSTS and the ADEC;
- Description and dates of any incidences of significant spills, leaks, or other releases which have the potential to impact discharged storm water;
- Employee training records will be placed either in Appendix C or the files are maintained elsewhere, their location will be identified in Appendix C;
- Documentation of maintenance and repairs of control measures, including dates;
- Inspection reports;
- Records of deviation of schedule for visual assessment and/or monitoring (such as no discharges observed);
- Details of any corrective actions taken (including associated triggering event); and
- Guidance for submitting the annual reports using the ADEC Division of Water's Online Application System is included in Appendix B;
- A copy of the 2015 MSGP (attached as Appendix D).

Forms to document the required records are included in Appendix B.

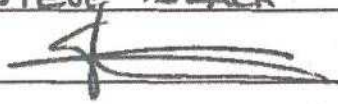
6.0 SWPPP CERTIFICATION

The site was evaluated for the presence of non-storm water discharges. North Star Terminal & Stevedore Company, LLC is not aware of any non-storm water discharges located on site.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

North Star Terminal & Stevedore Company, LLC

Name: STEVE BLACK Title: ANCHORAGE OPERATIONS MANAGER

Signature:  Date: 7-30-15

This should be signed by the chief executive officer or other authorized representative of North Star Terminal & Stevedore Company, LLC. For corporations, this must be a responsible corporate officer defined as a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation. The document may also be signed by the manager of the facilities if they are authorized to make management decisions which govern the operation of the regulated facility, including having explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long-term compliance with environmental laws and regulations.

Attachment F

7/20/2015 Sampling Event Documentation

Laboratory Analysis Report

Steve Black
North Star Terminal & Stevedore Co.,LLC
790 Ocean Dock Rd
Anchorage, Anchorage AK 99501

Work Order:	1153959
	North & South Outfall
Client:	North Star Terminal & Stevedore Co.,LLC
Report Date:	August 03, 2015

Forest Taylor
Alaska Division Project Manager
2015.08.03 15:02:07 -08'00'

SGS maintains a formal Quality Assurance/Quality Control (QA/QC) program. A copy of our Quality Assurance Plan (QAP), which outlines this program, is available at your request. The laboratory certification numbers are AK00971 (DW Chemistry & Microbiology) & UST-005 (CS) for ADEC and 2944.01 for DOD ELAP/ISO 17025 (RCRA methods: 1020B, 1311, 3010A, 3050B, 3520C, 3550C, 5030B, 5035A, 6020A, 7470A, 7471B, 8015C, 8021B, 8082A, 8260B, 8270D, 8270D-SIM, 9040C, 9045D, 9056A, 9060A, AK101 and AK102/103). Except as specifically noted, all statements and data in this report are in conformance to the provisions set forth by the SGS QAP and, when applicable, other regulatory authorities.
The following descriptors or qualifiers may be found in your report:

*	The analyte has exceeded allowable regulatory or control limits.
!	Surrogate out of control limits.
B	Indicates the analyte is found in a blank associated with the sample.
CCV/CVA/CVB	Continuing Calibration Verification
CCCV/CVC/CVCA/CVCB	Closing Continuing Calibration Verification
CL	Control Limit
D	The analyte concentration is the result of a dilution.
DF	Dilution Factor
DL	Detection Limit (i.e., maximum method detection limit)
E	The analyte result is above the calibrated range.
F	Indicates value that is greater than or equal to the DL
GT	Greater Than
ICV	Initial Calibration Verification
J	The quantitation is an estimation.
JL	The analyte was positively identified, but the quantitation is a low estimation.
LCS(D)	Laboratory Control Spike (Duplicate)
LOD	Limit of Detection (i.e., 1/2 of the LOQ)
LOQ	Limit of Quantitation (i.e., reporting or practical quantitation limit)
LT	Less Than
M	A matrix effect was present.
MB	Method Blank
MS(D)	Matrix Spike (Duplicate)
ND	Indicates the analyte is not detected.
Q	QC parameter out of acceptance range.
R	Rejected
RPD	Relative Percent Difference
U	Indicates the analyte was analyzed for but not detected.

Note: Sample summaries which include a result for "Total Solids" have already been adjusted for moisture content.
All DRO/RRO analyses are integrated per SOP.

SGS

SGS North America Inc.
CHAIN OF CUSTODY RECORD

1153959

Locations Nationwide
Alaska Maryland
New Jersey New York
North Carolina Indiana
West Virgina Kentucky
www.us.sgs.com

Instructions: Sections 1 - 5 must be filled out.
Omissions may delay the onset of analysis.

Page ___ of ___

Section 1

CLIENT: NORTH STAR TERMINAL & STEVEDORE CO. LLC
CONTACT: STEVE BLACK PHONE NO: 263-0121
PROJECT NAME: PROJECT/ PWSID/ PERMIT#:
REPORTS TO: E-MAIL: STEVEB@NORTHSTARAK.COM
INVOICE TO: QUOTE #: P.O. #:

Section 2

RESERVED for lab use	SAMPLE IDENTIFICATION	DATE mm/dd/yy	TIME HH:MM	MATRIX/ MATRIX CODE	# CONTAINERS	Type C = COMP G = GRAB M = Multi Incre-mental Soils	Preservative: HARDNESS	Preservative: CA, MG, MAGNESIUM HARDNESS, AL, FE, ZINC	REMARKS/ LOC ID
(1) A	A = NORTH OUTFALL	7/28/15	0921				X	X	
(2) A	B = SOUTH OUTFALL	7/28/15	0921				X	X	

Section 5

	Date	Time	
Relinquished By: (1)	7/28/15	0921	Received By:
Relinquished By: (2)	Date	Time	Received By:
Relinquished By: (3)	Date	Time	Received By:
Relinquished By: (4)	7/28/15	9:21	Received For Laboratory By:

Section 4

DOD Project? Yes No

Data Deliverable Requirements:

Cooler ID:

Requested Turnaround Time and/or Special Instructions:
STANDARD

Temp Blank °C: _____
or Ambient [ ]
(See attached Sample Receipt Form)

Chain of Custody Seal: (Circle)
INTACT BROKEN ABSENT
(See attached Sample Receipt Form)

[ ] 200 W. Potter Drive Anchorage, AK 99518 Tel: (907) 562-2343 Fax: (907) 561-5301
[ ] 5500 Business Drive Wilmington, NC 28405 Tel: (910) 350-1903 Fax: (910) 350-1557

SGS

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1153959

SAMPLE RECEIPT FORM

Review Criteria:	Yes	N/A	No	Comments/Action Taken:
Were **custody seals** intact? Note # & location, if applicable. COC accompanied samples?	☐ ☑	☑ ☐	☐ ☐	***Exemption permitted if sampler hand carries/delivers.***
Temperature blank compliant* (i.e., 0-6°C after CF)? *If >6°C, were samples collected <8 hours ago?* *If <0°C, were all sample containers ice free?* Cooler ID: _____ @ _____ w/ Therm.ID: _____ Cooler ID: _____ @ _____ w/ Therm.ID: _____ Cooler ID: _____ @ _____ w/ Therm.ID: _____ Cooler ID: _____ @ _____ w/ Therm.ID: _____ Cooler ID: _____ @ _____ w/ Therm.ID: _____ If samples are received without a temperature blank, the "cooler temperature" will be documented in lieu of the temperature blank & "**COOLER TEMP**" will be noted to the right. In cases where neither a temp blank nor cooler temp can be obtained, note "ambient" or "chilled."	☐ ☑ ☐	☐ ☐ ☑	☑ ☐ ☐	***Exemption permitted if chilled & collected <8 hrs ago.*** ***Note: Identify containers received at non-compliant temperature. Use form FS-0029 if more space is needed.***
Delivery method (specify all that apply): ☑Client (hand carried) ☐USPS ☐Lynden ☐AK Air ☐Alert Courier ☐UPS ☐FedEx ☐RAVN ☐C&D Delivery ☐Carlile ☐Pen Air ☐Warp Speed ☐Other: _____ → *For WO# with airbills, was the WO# & airbill info recorded in the Front Counter eLog?*	☐	☑	☐	

	Yes	N/A	No	
Were samples received within hold time? Do samples **match COC*** (i.e., sample IDs, dates/times collected)? Were analyses requested unambiguous?	☑ ☑ ☑	☐ ☐ ☐	☐ ☐ ☐	***Note: Refer to form F-083 "Sample Guide" for hold times.*** ***Note: If times differ <1hr, record details and login per COC.***
Were samples in **good condition** (no leaks/cracks/breakage)? Packing material used (specify all that apply): ☐Bubble Wrap ☐Separate plastic bags ☐Vermiculite ☐Other:	☑	☐	☐	
Were **proper containers** (type/mass/volume/preservative*) used? Were **Trip Blanks** (i.e., VOAs, LL-Hg) in cooler with samples? Were all VOA vials **free of headspace** (i.e., bubbles ≤6 mm)? Were all soil VOAs **field extracted** with MeOH+BFB?	☑ ☐ ☐ ☐	☐ ☑ ☑ ☑	☐ ☐ ☐ ☐	☐ ***Exemption permitted for metals (e.g., 200.8/6020A).***
For preserved waters (other than VOA vials, LL-Mercury or microbiological analyses), was **pH verified and compliant**? If pH was adjusted, were bottles flagged (i.e., stickers)?	☑ ☑	☐ ☐	☒ ☐	I ml HNO3 is added with Lot #LW-09-0463-9-2 VLP 7/29/15
For **special handling** (e.g., "MI" soils, foreign soils, lab filter for dissolved…, lab extract for volatiles, Ref Lab, limited volume), were bottles/paperwork flagged (e.g., sticker)?	☐	☑	☐	
For **RUSH/SHORT Hold Time**, were COC/Bottles flagged accordingly? Was Rush/Short HT email sent, if applicable?	☐	☑	☐	
For **SITE-SPECIFIC QC, e.g. BMS/BMSD/BDUP**, were containers / paperwork flagged accordingly?	☐	☑	☐	
For any question answered "No," has the PM been notified and the problem resolved (or paperwork put in their bin)?	☐	☑	☐	SRF Completed by: KPV 7/28/15 PM notified:
Was **PEER REVIEW** of ***sample numbering/labeling completed?***	☑	☐	☐	Peer Reviewed by: VDL

Additional notes (if applicable):

Note to Client: *Any "no" answer above indicates non-compliance with standard procedures and may impact data quality.*

SGS

Sample Containers and Preservatives

Container Id	Preservative	Container Condition	Container Id	Preservative	Container Condition
1153959001-A	HNO3 to pH < 2	PA			
1153959002-A	HNO3 to pH < 2	PA			

Container Condition Glossary

Containers for bacteriological, low level mercury and VOA vials are not opened prior to analysis and will be assigned condition code OK unless evidence indicates than an inappropriate container was submitted.

OK - The container was received at an acceptable pH for the analysis requested.
PA - The container was received outside of the acceptable pH for the analysis requested. Preservative was added upon receipt and the container is now at the correct pH. See the Sample Receipt Form for details on the amount and lot # of the preservative added.
PH - The container was received outside of the acceptable pH for the analysis requested. Preservative was added upon receipt, but was insufficient to bring the container to the correct pH for the analysis requested. See the Sample Receipt Form for details on the amount and lot # of the preservative added.
BU - The container was received with headspace greater than 6mm.

SGS

SGS Ref.#	1153959002		
Client Name	North Star Terminal & Stevedore Co.,LLC	**Printed Date/Time**	08/03/2015 12:15
Project Name/#	North & South Outfall	**Collected Date/Time**	07/28/2015 9:21
Client Sample ID	B=South Outfall	**Received Date/Time**	07/28/2015 9:21
Matrix	Water (Surface, Eff., Ground)	**Technical Director**	**Stephen C. Ede**

Sample Remarks:

Parameter	Results	LOQ	Units	Method	Container ID	Allowable Limits	Prep Date	Analysis Date	Init
Metals by ICP/MS									
Aluminum	55100	1000	ug/L	EP200.8	A		07/30/15	07/31/15	EAB
Calcium	73400	2500	ug/L	EP200.8	A		07/30/15	07/30/15	EAB
Hardness as CaCO3	335	25.0	mg/L	SM21 2340B	A		07/30/15	07/30/15	EAB
Iron	123000	1250	ug/L	EP200.8	A		07/30/15	07/30/15	EAB
Lead	731	1.00	ug/L	EP200.8	A		07/30/15	07/30/15	EAB
Magnesium	36900	250	ug/L	EP200.8	A		07/30/15	07/30/15	EAB
Zinc	2960	25.0	ug/L	EP200.8	A		07/30/15	07/30/15	EAB

SGS

SGS Ref.#	1153959001		
Client Name	North Star Terminal & Stevedore Co.,LLC	**Printed Date/Time**	08/03/2015 12:15
Project Name/#	North & South Outfall	**Collected Date/Time**	07/28/2015 9:21
Client Sample ID	A=North Outfall	**Received Date/Time**	07/28/2015 9:21
Matrix	Water (Surface, Eff., Ground)	**Technical Director**	**Stephen C. Ede**

Sample Remarks:

Parameter	Results	LOQ	Units	Method	Container ID	Allowable Limits	Prep Date	Analysis Date	Init
Metals by ICP/MS									
Aluminum	23100	400	ug/L	EP200.8	A		07/30/15	07/31/15	EAB
Calcium	29400	2500	ug/L	EP200.8	A		07/30/15	07/30/15	EAB
Hardness as CaCO3	132	25.0	mg/L	SM21 2340B	A		07/30/15	07/30/15	EAB
Iron	43000	1250	ug/L	EP200.8	A		07/30/15	07/30/15	EAB
Lead	134	1.00	ug/L	EP200.8	A		07/30/15	07/30/15	EAB
Magnesium	14300	250	ug/L	EP200.8	A		07/30/15	07/30/15	EAB
Zinc	674	25.0	ug/L	EP200.8	A		07/30/15	07/30/15	EAB